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Debra L. Spinelli and Ava Schaefer*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

FRESH MIX, LLC,

Plaintiffs,

vs.

PISANELLI BICE, PLLC, a Nevada Law Firm and Professional Limited Liability Company; JAMES P. PISANELLI, ESQUIRE, an individual; DEBRA L. SPINELLI, ESQUIRE, an individual; AVA SCHAEFER, ESQUIRE, an individual; COHEN DOWN QUIGLEY PC, an Arizona Law Firm and Professional Corporation; RONALD J. COHEN, an individual; BETSY LAMM, an individual; DANIEL QUIGLEY, an individual; JENNA BROWNLEE, an individual; BRUCE A LESLIE, CHTD., a Nevada Firm; BRUCE A. LESLIE, an individual; BROWNSTEIN HYATT FARBER SCHRECK LLP, a Colorado Limited Liability Partnership; SAMUEL A. SCHWARTZ, an individual, and SCHWARTZ LAW, PLLC; and ZACHARIAH LARSON, an individual; and LARSON & ZIRZOW, LLC.

Defendants,

CASE NO.: 2:24-cv-00397-JCM-NJK

**STIPULATION AND PROPOSED  
ORDER EXTENDING TIME TO  
FILE REPLY IN SUPPORT OF  
MOTION TO DISMISS FRESH  
MIX, LLC'S FIRST AMENDED  
COMPLAINT PURSUANT TO  
FED. R. CIV. P. 12(b)(6) (ECF NO.  
34)**

**(First Request)**

Pursuant to Local Rules IA 6-1 and 6-2 and LR 7-1, IT IS HEREBY STIPULATED AND AGREED between Plaintiff Fresh Mix, LLC (“Plaintiff”) and Defendants Pisanelli Bice, PLLC, James J. Pisanelli, Debra L. Spinelli and Ava Schaefer (collectively, “PB Defendants” and, together with Plaintiff, the “Parties”), by and through their undersigned counsel of record, that the PB Defendants shall have an additional 7 days to file their reply in support of the pending Motion to Dismiss Fresh Mix, LLC’s Amended Complaint Pursuant to Fed. R. Civ. P. 12(b)(6) (ECF No. 34) (the “Motion”). The PB Defendants’ original deadline to file their reply is May 15, 2024. With an additional 7 days, the PB Defendants’ deadline to file their reply is extended to May 22, 2024.

Good cause exists for the extension set forth herein. First, the PB Defendants require additional time to prepare a reply in support of the Motion as the undersigned counsel is preparing a dispositive motion with enlarged page limits that is due before the existing deadline in another matter pending in Nevada state court. Additionally, the undersigned counsel is preparing for a series of party-depositions that will occur next week in another matter pending in Nevada state court.

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1 This is the first extension requested for Defendants to file their reply in support of the Motion  
2 and is not made for the purpose of delay.

3 IT IS SO STIPULATED.

4 DATED this 14th day of May, 2024

DATED this 14th day of May, 2024

5 CAMPBELL & WILLIAMS

STERN & EISENBERG

6 By /s/ Philip R. Erwin

By /s/ Steven K. Eisenberg

7 J. COLBY WILLIAMS, ESQ.

STEVEN EISENBERG, ESQ. (*pro hac vice*)

8 PHILIP R. ERWIN, ESQ.

SAMUEL R. MIRKOVICH, ESQ.

LAW OFFICE OF MATTHEW L. SHARP

9 PISANELLI BICE

MATTHEW L. SHARP

10 JAMES J. PISANELLI, ESQ.

*Attorneys for Plaintiff*

11 TODD L. BICE, ESQ.

*Fresh Mix, LLC*

12 DEBRA L. SPINELLI, ESQ.

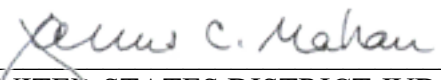
JORDAN T. SMITH, ESQ.

13 *Attorneys for Defendants*

14 *Pisanelli Bice, PLLC, James P. Pisanelli,*

15 *Debra L. Spinelli and Ava Schaefer*

16  
17 **IT IS SO ORDERED.**

18  
19   
20 UNITED STATES DISTRICT JUDGE

21 DATED: May 14, 2024

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of May, 2024, I caused a true and correct copy of the foregoing Stipulation and Proposed Order Extending Time to File Reply in Support of Motion to Dismiss Fresh Mix, LLC's First Amended Complaint to be served via the United States District Court CM/ECF system on all parties or persons requiring notice.

/s/ Philip R. Erwin

An employee of Campbell & Williams